

Before the  
**NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION**  
 Washington, DC 20230

In the Matter of

ADMINISTRATION OF COUPON PROGRAM FOR	)	Docket # 060512129-6129-01
DIGITAL-TO-ANALOG CONVERTER BOXES	)	RIN 0660-AA16
	)	

**COMMENTS OF LINCOLN BROADCASTING COMPANY**

Lincoln Broadcasting Company, A California Limited Partnership ("Lincoln"), licensee of independent, full-power commercial television broadcast station KTSF, San Francisco, CA ("KTSF"), submits these Comments in response to the Notice of Proposed Rulemaking ("Notice") in the above-referenced proceeding. Based on its ownership and operation of the nation's largest Asian-language broadcast station for the past thirty years, Lincoln urges NTIA to assure that its consumer and retailer education efforts for the digital-to-analog converter box coupon program include materials in the major foreign languages that are the sole or primary languages of many viewers who receive only over the air television broadcast signals. Multilingual information is essential to achieving NTIA's statutory imperatives in the timely, efficient manner that is the focus of NTIA's request for comment.

**Lincoln's Interest and Basis for Comment.** KTSF is the main provider of television news, public affairs and entertainment programming to Asian Americans in the San Francisco area.<sup>1</sup> Broadcasting analog and digital signals essentially 24 hours per day, seven days per week, KTSF is the only station in the United States to produce and air nightly, live television newscasts in

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<sup>1</sup> Facts in these Comments that are not otherwise attributed, or for which NTIA may take official notice, are attributed to KTSF General Manager Michael J. Sherman.

Cantonese and Mandarin, the two major Chinese dialects. KTSF also broadcasts daily same-day in-language news from Japan, Hong Kong, Taiwan, Korea and the Philippines. KTSF was the first Asian-language media outlet in the United States to subscribe to Nielsen Media Research. According to the 2000 U.S. Census, in that year the market included 1,300,000 Asian Americans, sixty (60) per cent -- or 780,000 -- of whom spoke a language other than English as their sole or primary language.<sup>2</sup>

From its three decades of experience Lincoln can attest that providing important information to such viewers requires that it be in their sole or primary language. Providing them information solely in English is akin to not informing them at all. This is particularly important to NTIA's coupon program because viewers whose sole or primary language is not English are especially likely to qualify for coupons. In 2005, for example, forty-two (42) per cent of KTSF's Chinese-language viewers -- the largest component of KTSF's audience -- received only over the air analog broadcast signals and did not subscribe to cable or satellite television.<sup>3</sup> In contrast, only 14.86 percent of total U.S. television households relied exclusively on over the air transmission as of June 2004.<sup>4</sup>

**Multilingual consumer and retailer education is essential to multiple NTIA goals:**

- NTIA's proposed definition of coupon-eligible households -- those that only receive over the air television via analog-only receivers (Notice, p. 3) -- includes significant numbers of non-English speakers.<sup>5</sup>
- Wide availability of coupon application forms (Notice, p. 5) cannot be achieved with English-only materials. In communities where Chinese is the sole or main language,

<sup>2</sup> 2000 U.S. Census. It is likely that the San Francisco-area Asian American population is considerably larger now than in 2000.

<sup>3</sup> Proprietary KTSF Chinese Consumer Study, conducted by Interviewing Service of America, August, 2005 ("KTSF Study").

<sup>4</sup> Notice, p. 3 and n. 6.

<sup>5</sup> KTSF Study, *supra*.

for example, even universal distribution of English-language forms would achieve, in effect, little or no availability. Even viewers who speak workable English are often uncomfortable with official English-language forms.

- Reliance on English-only materials would not advance the “highest priority” goal of an application system designed to prevent waste, fraud and abuse (Notice, pp. 5 and 8) while minimizing the burden on participating retailers and consumers (Notice, p.8). It would waste time and resources to provide only English-language information initially, only to have to provide it again in other languages.
- NTIA’s proposal to fulfill requests on a first-come first-served basis (Notice, p. 4) also necessitates multilingual consumer materials. Without them, many eligible households could be shut out of the process completely, and at minimum would have an unequal opportunity to participate.
- Efficiencies from the proposed use of the Internet by consumers to file and track applications (Notice, p. 5) require multilingual advisories about the availability of the online options and instructions for their use.

**Conclusion.** In the Notice NTIA asks about ways to target households that only receive over the air television. A way that is both necessary and relatively simple and inexpensive to implement is for NTIA to provide consumer and retailer advisories in Chinese, Vietnamese and other major foreign languages spoken by significant numbers of U.S. television households. A portion of NTIA’s consumer education budget should be devoted to that. To not do so would be far more costly in terms of inefficiency, waste and delay. Notwithstanding, and acknowledging, NTIA’s

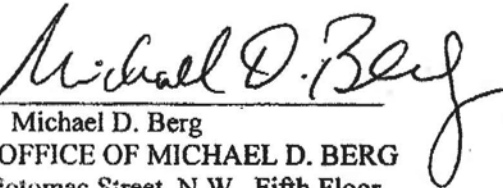
expressed need for complementary efforts by private industry (Notice, page 8), it is important that NTIA take the lead and assure consistency in multilingual aspects of the process.

Respectfully submitted,

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